

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

ELISA ZAYAS ZAYAS

DEBTOR

CASE NO. 15-07852/ESL

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO
REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET #27**

TO THE HONORABLE COURT:

NOW COMES, ELISA ZAYAS ZAYAS, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. Money Express filed a *Trustee's Motion to Dismiss*, docket #27, stating that the debtor has failed to maintain current the proposed Plan payments in the sum of \$350.00.

2. On February 8, 2017, the debtor called the undersigned attorney's offices and informed that she is in the process of obtaining the funds to cure the Plan arrears with the Trustee. The debtor respectfully understands that she needs fourteen (14) days to make the Plan payments in arrears and favorably resolve this situation, which extension time to expire on February 22, 2017.

3. The debtor respectfully submits to this Honorable Court that she needs additional time cure the Plan arrears with the Trustee and reply to the *Motion to Dismiss*, docket #27, in the present case.

WHEREFORE, debtor, through their undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

Page – 2-

Debtors' Motion for Ext of Time To Reply to MTD

Case no. 15-07825/ESL13

I **CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the debtor, Elisa Zayas Zayas, to the address of record: HC 20 Box 26375, San Lorenzo, PR 00754.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 8th day of February, 2017.

/s/ Roberto Figueroa Carrasquillo
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